

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

<b>FEDERAL INSURANCE COMPANY,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>vs.</b>	)	<b>No. 4:12 CV 2117 HEA</b>
	)	
<b>CLAIRE M. SCHENK, as Receiver, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**DEFENDANT DIXON BROWN'S CONSENT MOTION FOR  
EXTENSION OF TIME TO FILE ANSWER TO COMPLAINT**

Comes now Defendant DIXON BROWN, by and through counsel, and for his Consent Motion for Extension of Time to File Answer to Complaint, states as follows:

1. Plaintiff filed its Complaint (Document 1) on November 13, 2012.
2. On December 17, 2012, Defendant Brown's Waiver of Service (Document 13) was filed with the Court thereby requiring an Answer to be filed on January 28, 2013.
3. All parties have agreed that an extension of the time to file an Answer and a uniform Answer date may help facilitate an early resolution of the Interpleader action.
4. Defendant Claire M. Schenk, as Receiver for Acatha Group LLC, MIC VII, LLC, Acatha Technology Partners, LP, and Gryphon Investments III, LLC, has not yet accepted service, although it is anticipated that a Motion to lift a stay of litigation against the Receiver will be filed within a few days so that she may accept service of summons in this Interpleader action.
5. Defendant Dixon Brown respectfully requests that he be given an extension of time to file his Answer, to and including the date on which the Receiver's Answer will become due.

WHEREFORE, for the forgoing reasons, Defendant prays that this Court order that Defendant Dixon Brown be granted an extension of time to file his Answer, to and including the date on which the Receiver's Answer will become due and any further relief as the Court deems proper in the premises.

Respectfully submitted,

**/S/ HARDY C. MENEES**

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 28, 2013, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

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